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Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, N.W.  
Washington, DC 20554

Re: CC Docket No. 96-98; Petition for Declaratory Ruling

Dear Ms. Salas:

It has just come to Verizon's attention that AT&T Wireless Services, Inc. and VoiceStream Wireless Corporation filed a petition for declaratory ruling on November 19, 2001, addressing provision of certain unbundled network elements to commercial mobile radio service ("CMRS") providers. Because the Commission has not specified filing dates, under section 1.45(b) of the Commission's rules, oppositions are due today.

Verizon previously addressed similar issues, explaining why connections between CMRS switching locations and cell sites do not qualify as unbundled network elements. *See* letter dated August 22, 2001, to Magalie Roman Salas from W. Scott Randolph, a copy of which is attached. To the extent AT&T and VoiceStream argue otherwise, they are wrong and their petition should be denied.

To the extent the petition deals with conversion of existing special access facilities to unbundled network elements, this general topic will be directly addressed in consideration of the triennial review unbundled network elements as well as in resolving the pending petition seeking to eliminate conversions of special access services to unbundled network elements. It makes no sense to address this submission outside the context of the more comprehensive proceeding. However, in the event the Commission plans to address the issues here separately from the broader proceeding, Verizon requests an additional opportunity to comment.

Sincerely,

/S/

Lawrence W. Katz